



SPRING 2010 ISSUE NO. 8

NEW REGULATIONS REQUIRING INTERSTITIAL MONITORING ON EMERGENCY GENERATORS

In order to meet the final secondary containment requirement of the Energy Policy Act of 2005, LDEQ promulgated a rule requiring all emergency power generator UST systems installed after August 20, 2009 to have secondary containment (double-walled or jacketed tanks and piping) with monthly interstitial monitoring provided on both the tanks and any associated pressurized piping.

The interstitial monitoring requirement only affects emergency power generator UST systems installed after August 20, 2009. Emergency power generator UST systems installed between December 20, 2008 and August 20, 2009 are required to have secondary containment but not interstitial monitoring, as they are still deferred from release detection. Emergency power generator UST systems installed prior to December 20, 2008 are not required to have secondary containment or interstitial monitoring, as they are still deferred from release detection.

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Effective May 1, 2010: Electronic UST Forms

Available on the Web at:

<http://www.deq.louisiana.gov/portal/tabid/2659/Default.aspx>

INTERSTITIAL MONITORING RECORDKEEPING REQUIREMENTS

A very common violation seen by LDEQ is the lack of monthly release detection records for tanks and piping. UST regulations require UST owners and operators to keep three years of monthly release detection records, regardless of the type of release detection conducted, including interstitial monitoring.

Interstitial monitoring can be conducted either continuously with tank and sump sensors, or manually by visual observations of sumps. Regardless of the type of interstitial monitoring conducted, monthly release detection records must be kept.

Interstitial monitoring can be conducted continuously with interstitial tank sensors for the tanks and sump sensors for the piping. Ideally, the ATG or console used should keep a record



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that the sensors are in communication with the console (sensor normal records or all functions normal records). These records are easily retrieved from the console. In the case that these records are not available, LDEQ will accept a written monthly record or handwritten log showing that someone looked at the console at least once every 30 days and verified that the console displayed the "all functions normal" or "sensor normal" messages. This record must include the date of the verification, the initials or signature of the person performed the verification, and an indication that no alarm messages were indicated and the system was working properly.

Interstitial monitoring can be conducted manually by visually inspecting containment sumps for releases at least once every 30 days. Manual interstitial monitoring records must include an identifier or description of each sump inspected, the date of the inspection, the initials or signature of the person performing the inspection, an indication if there is any product or water in the sump, and comments regarding any corrective action taken in response to product or water in the sump.

HELPFUL DOCUMENT LINKS:

- [Final Version of Closure Guidance Document](#)
- [Closure Guidance Document Memo](#)

FILLING OUT INSTALLATION AND RENOVATION FORMS CORRECTLY

UST systems installed after December 20, 2008 are required to have secondary containment (double-walled or jacketed tanks and piping) with monthly interstitial monitoring provided on both the tanks and the piping, and if 25% or more of a piping run to any one UST is repaired or replaced, the entire piping run must be secondarily contained with monthly interstitial monitoring.

30 days prior to an installation, upgrade, or repair, the UST owner must notify LDEQ by submitting the UST-ENF-04 form to the appropriate UST Division Regional Office. LDEQ Regional Office staff must also be notified 7 days prior to commencing installations or repairs. The only exception to this is for emergency repairs. The UST-ENF-04 form is available on the LDEQ website at <http://www.deq.louisiana.gov/portal/tabid/2674/Default.aspx>.

LDEQ has been receiving many UST Installation and Repair notification forms that are not filled out correctly. Many UST owners and certified workers are submitting forms that do not indicate the type of secondary containment for the tank and piping and the type of interstitial monitoring for the tank and piping that will be installed and used at the site. LDEQ will return these forms to the UST owner and will require re-submittal with the correct information that indicates that the facility will be in compliance with the new secondary containment regulations.

For more information on this topic or any others, please call Samuel Broussard, LDEQ UST Division, at 337-262-5744 or send him an email at samuel.broussard@la.gov.

CONTRACT INFORMATION: LDEQ HAS AWARDED THE FOLLOWING AMERICAN RECOVERY AND REINVESTMENT ACT (ARRA) FUNDED ABANDONED UST CONTRACTS:

- Abandoned UST Site Investigation and Risk Evaluation - U.P. Lachney Estate Property – Awarded to *Jones Environmental, Inc.*
- Abandoned UST Site Investigation and Risk Evaluation - Former Amite City Ford Body Shop – Awarded to *ATC Group Services, Inc.*
- Abandoned UST Site Investigation and Risk Evaluation - C.V. Davis Property – Awarded to *Jones Environmental, Inc.*
- Abandoned UST Site Investigation and Risk Evaluation - Earl Hutcherson Estate – Awarded to *SEMS, Inc.*
- Abandoned UST Site Investigation and Risk Evaluation - Former Acosta's Exxon – Awarded to *SEMS, Inc.*

ANNUAL REGISTRATION CERTIFICATES

The 2010 UST Registration Certificates will expire on June 30, 2010. Invoices for UST Annual Registration Fees were mailed to all owner/operators in March. If you have not received your UST invoice (For fiscal period 07-2010/06-2011) for your FY2011 certificate of registration, please contact the Underground Storage Tank Division at DEQ-wwwUST@LA.gov to make sure that your registration information is up to date. If any registration information has changed, you are required to submit an amended registration form (**UST REG-01**) to notify LDEQ's UST Division of these changes within

30 days. Certificates will not be issued to facilities with outstanding registration fees.

UST CERTIFIED WORKER EXAM SCHEDULE 2010

DATE AND TIME	REGION	LOCATION
May 6 Installation/Repair 8:30AM Closure 1:30PM	CRO	LA. DEQ (Map) Galvez Building

XP SCHOOL SCHEDULE 2010

DATE AND TIME	REGION	LOCATION
May 12 8:00AM - 12:00PM	ARO/SWRO	LA Technical College (Map) Morgan Smith Campus - Jennings
June 2 1:00PM - 5:00PM	CRO	LA DEQ (Map) Galvez Building
June 16 8:00AM - 12:00PM	NERO	LA Technical College (Map) Alexandria Campus - Alexandria

UST RULE UPDATES AND CHANGES

Rule	Effective Date	View the Rule Changes
Interstitial Monitoring Requirement for Emergency Power Generator UST Systems	Proposed	LAC 33:XI.101 and 303
Miscellaneous Corrections	Proposed	LAC 33:XI.1121
LDEQ Monthly Regulation Changes Electronic Notification	Current	Electronic Notification

